

EXHIBIT P

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IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION

DR. AMY R. WOODS
VS.
MHM HEALTH PROFESSIONAL, LLC, D/B/A
CENTURION PROFESSIONALS;
MANAGEMENT & TRAINING CORPORATION;
JESSE WILLIAMS, INDIVIDUALLY; AND
JOHN DOES 1-9

PLAINTIFF
CAUSE NO. 3:19-CV-00234-NBB-RP
DEFENDANTS

DEPOSITION OF DR. CLAYTON RAMSUE

TAKEN AT THE INSTANCE OF THE PLAINTIFF
VIA ZOOM VIDEOCONFERENCE
ON AUGUST 7, 2020, BEGINNING AT 2:06 P.M.

GENA MATTISON GLENN, CSR 1568
Glenn-Henry Reporting
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Amory, Mississippi 38821-0492
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(662) 315-2613

1 run by Centurion or any anywhere else? Aside
2 from what you've told us about talking to April
3 Meggs, did you do anything else to try to get
4 her a place somewhere else?

5 MR. LONG-DANIELS: Objection to form.

6 You can answer.

7 A. I never had that conversation.

8 BY MR. WAIDE:

9 Q. All right, sir. Do you remember Dr.

10 Woods asking you for a recommendation for her

11 employment with Sterling Medical Group? Do you

12 recall that?

13 A. Yes.

14 Q. And did you give her a recommendation?

15 A. Yes.

16 Q. Good recommendation?

17 A. Yes.

18 Q. I think I left this train of thought,
19 but you said you were aware that there was a
20 statewide shortage of security officers just in
21 Mississippi in general?

22 MR. LONG-DANIELS: Objection to form.

23 A. Yes.

24 BY MR. WAIDE:

25 Q. Is that -- there's been a lot of media